

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

IN RE ADVOCATE AURORA HEALTH
PIXEL LITIGATION

Lead Case No. 22-CV-1253-JPS

(Consolidated with Case Nos. 22-CV-1278-
JPS; 22-CV-1305-JPS; 23-CV-00259-JPS;
23-CV-00260-JPS)

This Document Relates to: All Actions

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Under Federal Rule of Civil Procedure 23(e), Plaintiffs Shyanne John, Richard Webster, Deanna Danger, James Gabriel, Katrina Jones, Derrick Harris, Amber Smith, Bonnie LaPorta, Alistair Stewart, and Angel Ajani (collectively, "Plaintiffs") respectfully move this Court to enter the proposed Order Granting Final Approval of Class Action Settlement (attached as **Exhibit 1** to the memorandum in support of this Motion) consisting of a \$12,225,000 non-reversionary common fund settlement permitting pro rata cash payments from the Settlement Fund to Class Members submitting valid claims after the discussion of \$3,500 to each of the Plaintiffs (\$35,000 total) as Class Representative Service Awards, \$2,750,000 for Kroll's settlement administration fees and costs, \$3,250,000 for Class Counsel's reasonable attorneys' fees, and \$23,356.02 for reasonable expense reimbursement to Class Counsel. The grounds for the Court's potential granting of this unopposed Motion are included in the accompanying Memorandum in Support of Final Approval of Class Action Settlement and Plaintiffs' Motion for Attorneys' Fees, Expenses, and Class Representatives Service Awards (ECF No. 38) (and its supporting documents). Also, in support of this Motion, Plaintiffs attach in support the Joint Declaration of Gary M. Klinger and

Terence R. Coates in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement (**Exhibit 2**), and the Declaration of Scott M. Fenwick of Kroll Settlement Administration, LLC in Connection with Final Approval of Settlement (**Exhibit 3**).

Respectfully submitted,

/s/ Terence R. Coates

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